

JUL 29 1985

Texas Department of Water Resources

INTEROFFICE MEMORANDUM

TO : Bryan Dixon, P. E., Chief,
Solid Waste and Spill Response Section

DATE: July 23, 1985

THRU :

FROM : Gerardo H. Garcia, Environmental Quality Specialist, District 4

SUBJECT: Chemical Recycling - Wylie, Texas
Registration No. 32355

On July 9, 1985, the writer, Don Eubank, and Harry Carrola of central office contacted J. R. (Bob) Siemoneit, President, and Gerald (Jerry) G. Brock, Plant Manager, and conducted an inspection to determine compliance with the Compliance Agreement dated May 15, 1985. The following deficiencies were noted concerning this inspection. They are as follows:

1. Item I of the Compliance Agreement states that by June 1, 1985 the company shall remove sludge from the concrete drying basins. Furthermore, the company was to remove the sludge to DOT approved containers, wash the concrete basins to remove sludge residue, and dispose of the washwater by July 15, 1985. At the time of the inspection, the west concrete basin contained approximately a 1.5 foot-2 foot thick layer of sludge. The east concrete basin contained a sludge residue and 1.5 feet-2 feet of process washwater.

In correspondence dated June 27, 1985 from this agency, the company was required only to remove the sludge from the concrete basins, place it in drums and dispose of it off-site when the disposal site could accept it. As described above, one side of the concrete basin has not had the sludge removed and the other side (east side) is being used to store process wastewater. Based on these findings, Item IA and IB of the Compliance Agreement has not been accomplished.

2. Item II of the Compliance Agreement states that by July 1, 1985 the company shall close the earthen pit and channel by removing all wastes and waste residues. The company has not connected the process water drainage, including cooling water blowdown, from the plant to the local sewer system as required by Section IIA of the Compliance Agreement. The company has modified its sanitary sewer connection by elevating the connection from the bottom of the earthen pit up to ground level and extending the line approximately 20 feet in front of the processing area before it is stubbed out. According to Mr. Brock, the process wastewater is then pumped from the east concrete basin and from drums in the process area to the sanitary sewerage system. This does not prevent contaminated runoff and spillage from the process area from being discharged

9823367



into the recently excavated drainage ditch and earthen pit. The company also did not collect and dispose of all liquids in the pit at an off-site disposal facility as required by Section IIB of the Compliance Agreement. Mr. Siemoneit stated that these liquids were disposed of into the sanitary sewerage system. Contaminated soil from the pit and channel has been excavated by the company, but a soil analysis for 1,1,1 trichloroethane, tetrachloroethylene, xylene, toluene, total lead, zinc, and chromium has not been accomplished as required by Section IIC of the Compliance Agreement. The contaminated soil is piled up-slope of the excavation. This contaminated soil is to be removed to an off-site disposal facility by August 15, 1985 in accordance with Item IID of the Compliance Agreement. Don Eubank requested that the excavated soil be covered with an impermeable material to avert stormwater becoming contaminated through contact with the soil. The District 4 Office was not given notice of this excavation which prevented any sampling of the soil at the time the excavation took place.

3. Item III of the Compliance Agreement states that the company is required to reduce and maintain the number of empty drums stored on-site to 200 or less by June 15, 1985. At the time of the inspection, the company had 339 empty drums stored directly north and northeast of the company's warehouse.
4. Item IV of the Compliance Agreement states that the company shall reduce and maintain the number of drums containing solvents to be recycled to 200 or less by June 15, 1985. At the time of the inspection, a total of two hundred and forty-five 55-gallon drums of waste solvent to be recycled were stored on-site. Two hundred and seventeen 55-gallon drums of waste solvent to be recycled were located on the waste process area concrete slab and twenty-eight 55-gallon drums of waste solvent to be recycled were located in the company's warehouse.
5. Item V of the Compliance Agreement states that the company shall remove by August 1, 1985 approximately 350 drums of unrecyclable still bottoms to an off-site disposal facility. At the time of the inspection, approximately 1,372 drums of unrecyclable still bottoms were on-site. Approximately 870 of these drums were inside the company's warehouse, approximately 335 drums were located in the company's old drum storage area, 52 drums were located in the company's processing area, 65 drums were located north and east of the company's warehouse and 50 drums were located east of the company's processing area.
6. Item VI of the Compliance Agreement states that by June 1, 1985 the company shall inspect the inventory of drums containing paint residue, redrum the contents of any leaking or corroding drum, store these drums in a single area, and have no more than 700 of these drums on-site. At the time of the inspection, 676 drums of this material were being speculatively accumulated on-site. More than 60% of these drums were leaking or corroded, and no effort was being made to correct this condition.

7. Item VII of the Compliance Agreement specifies that all drums stored on-site shall be labeled by the company as to content by June 15, 1985. Less than 5% of the 2,347 drums on-site were labeled as to content at the time of the inspection.
8. Item VIII of the Compliance Agreement states that all drums containing product shall be segregated by the company from other drums by May 15, 1985. There were 18 drums of product in the company's warehouse and 36 product drums were located east of the processing area at the time of the inspection. All 54 of these product drums were not segregated from waste containing drums.
9. The inspectors did not examine the monthly summary reports at the time of the inspection.
10. Item X of the Compliance Agreement requires that the company maintain an operating record at the facility by May 15, 1985. At the time of the inspection, the company did not have an adequate operating record.
11. Item XI of the Compliance Agreement states that the company shall implement a waste analysis plan by May 15, 1985 addressing both wastes from off-site sources and wastes generated on-site. Furthermore, records of all analyses should be logged and maintained at the facility. At the time of the inspection, the company had not implemented a waste analysis plan and had failed to log and maintain records of all analyses. The company had an outline of what a waste analysis plan should entail, but did not have an actual waste analysis plan which would comply with TAC 335.114.
12. Item XII of the Compliance Agreement states that the company shall construct and maintain facility security to prevent unknowing entry and minimize the possibility of unauthorized entry of persons or livestock by June 1, 1985. At the time of the inspection, the company had not accomplished this requirement. A breach in the company's chain-link fence was noted along the eastern property line. This breach in the chain-link fence was span by three strands of barbed wire. A barbed wire fence which defines the northwest, north, and northeast property line of the company also provides inadequate security. The barbed wire fences do not provide adequate security as required by TAC 335.115.
13. Item XIII of the Compliance Agreement states that the company shall develop and implement an inspection schedule by May 15, 1985. At the time of the inspection, the company's inspection log was inadequate. The log did not render any detailed information concerning which hazardous waste facilities were being inspected by the company. The inspection log designates a general inspection for drums and tanks, not specifying which drums and tanks it is referring to. The log did not note open or deteriorated drums, their location, or what corrective action was being taken.

14. Item XIV of the Compliance Agreement requires that personnel training documentation be developed by the company by May 15, 1985. At the time of the inspection, the company's personnel training records did not include employees who work outside in the waste process area. The extent of individual training is not documented for any employee at the facility, including J. R. Siemoneit and Gerald Brock.
15. Item XV of the Compliance Agreement states that the company shall demonstrate compliance with TAC 335.131-.137 concerning the safe maintenance and operation of the facility by May 15, 1985. At the time of the inspection, the facility was not maintained in a safe manner. There were numerous locations where spillage of waste material had contaminated soil on-site. There were several open and deteriorated drums on-site. There was spillage of waste material on the concrete pad in the waste processing area, in the product tank area, as well as the area surrounding open drums. There was one portable fire extinguisher for all on-site waste management facilities located outside. This device is not sufficient to comply with TAC 335.133(3). Pumps and flue dust are used to control spills. The company did not have any documentation to demonstrate compliance with TAC 335.137 concerning arrangements with local authorities. The company was not in compliance with TAC 335.136, pertaining to required aisle space in the warehouse and in the waste process area.
16. Item XVI of the Compliance Agreement states that the company shall comply with TAC 335.151-.157 concerning contingency plan and emergency procedures by June 1, 1985. The company's contingency plan does not include the location and physical description of each item on the company's emergency equipment list as well as a brief outline of the capabilities of each item as required by TAC 335.153(e). The company's emergency procedures consist of an outline of the emergency procedure regulations as stated in TAC 335.157. This was also true for the company's description of an emergency coordinator as specified in TAC 335.156.
17. Item XVII of the Compliance Agreement specifies that the company shall develop and maintain a hazardous waste management facility closure plan which will satisfy TAC 335.23 by June 1, 1985. At the time of the inspection, the company had not developed a hazardous waste management facility closure plan.
18. Item XVIII of the Compliance Agreement stated that the company shall provide proof of financial assurance for the company's hazardous waste management facilities by July 15, 1985. The writer contacted Russ Kimble on July 15, 1985 concerning this matter and Mr. Kimble asserted that the company had not met financial assurance requirements.

INDUSTRIAL SOLID WASTE MANAGEMENT PROBLEMS

1. The company has flue dust stored on the ground adjacent to the company's east chain-link fence. This material is used to solidify

waste still bottoms prior to off-site shipment and disposal. This material could cause rainwater runoff to become contaminated since it is exposed to the elements, is not contained, and could exhibit a high pH.

2. Incoming waste material which is to be recycled is stored in two up-right tanks (capacity unknown) on the east side of what was previously described as a product storage tank farm by Mr. Siemoneit. These two tanks should be included on the company's Part A Permit Application and should be addressed in the company's closure plan and closure cost estimates as hazardous waste management facilities.
3. There were several areas along the north and east property lines (defined by a barbed wire fence) which were contaminated with dry waste material which appears to be dried still bottoms. Attempts have been made to plow this material into the soil.
4. Numerous 55-gallon drums throughout the site were open and/or deteriorated.
5. The company discharges solvent contaminated wastewater collected in drums from the process area into the City of Wylie's sanitary sewerage system.
6. The company is working to reduce the number of drums containing waste, but it appears to be a very slow process. Drums of waste still bottoms are emptied into a 30 cu/yd roll-off container, and flue dust is mixed with the still bottoms in an attempt to solidify the waste. This is a very slow process since the company is having difficulty getting the disposal company to furnish them with roll-off containers on a regular basis and Chemical Recycling, at the time of this inspection, only had two employees other than Mr. Brock and Mr. Siemoneit. In the opinion of the writer, this does not provide adequate manpower to accomplish what is required in the Compliance Agreement, operate the recycling operation, and process the waste still bottom material on a drum-by-drum basis.
7. The only area of this site that is concrete is the process area and the floor of the warehouse. Neither of these areas are curbed. Any spillage from the warehouse would flow out the door and onto a rock roadway. Spillage from the process area (recycling area) would flow into the recently excavated drainage ditch and into the recently excavated earthen pit or directly to the south and onto the soil.

Approximately 245 drums of waste solvents to be recycled, 922 drums of still bottoms, and 18 drums of product for a total of 1,185 drums are stored in the process area and warehouse. Approximately 335 drums of still bottoms or unrecoverable waste are stored in the old drum storage area with no hard surface. Several drums in this area were open, deteriorated, and leaking or the contents had been spilled

onto the ground. Approximately 65 drums containing still bottoms were being stored just north of the warehouse which is an area subject to stormwater runoff. Approximately 50 drums containing still bottoms and 36 drums containing product are stored on the rock driveway east of the process area. Approximately 676 drums of "paint residue" is located along the west side of the property.

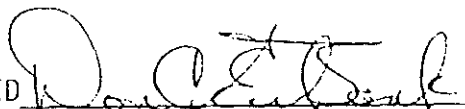
There appears to be approximately 2,347 drums of product, still bottoms, paint residue, waste solvents located on this site. Approximately 1,185 are located on concrete without curbing and approximately 1,162 drums are stored on soil or crushed rock road base.

8. The area designated as the product storage tank is an earthen tank farm area with 10 product tanks and 3 waste holding tanks. The soil inside the diked area is discolored indicating contamination from spillage from the tanks. About 20 feet north of the southeast corner is a 2-inch line with a valve. This line discharges to the old drum storage area.

This is reported for your information.

GHG:jc

APPROVED



SIGNED

